

United States District Court
District of Massachusetts

Dorel Steel Erection Corporation)	
Plaintiff)	
vs.)	
)	
Capco Steel Corporation)	Civil Action no. 05-10627 WGY
Defendant)	
and)	
Canam Steel Corporation)	
Reach and Apply Defendant)	

Motion to Reschedule Telephone Conversation

Now come the parties and request that the telephone conference now scheduled for June 1, 2006, be rescheduled.

In support whereof, Counsel report that Plaintiff has selected an accountant but have not been able to find a date prior to the hearing. In the meantime, Counsel have also met together to attempt to settle this case along with two others cases which exist between the parties. The ahve also been discussing mediating all three of the cases.

Counsel would propose that the Court set a date of June 1, 2006, to determine whether or not the cases can be settled.

If the cases cannot be settled but the parties agree to put the cases to a global mediation, that would be reported to the court by June 15, 2006.

If neither of these goals can be reached, Plaintiff would request that it be given until June 21, 2006, to inspect the documents, that copies of all relevant documents be provided to Plaintiff within fifteen days thereafter, and Plaintiff have thirty days to promulgate a response so that the case would proceed in Court.

Respectfully submitted,

/s/ Charles A. Roberts

/s/ David M. Campbell

Charles A. Roberts, Esq.
Counsel for the Plaintiff
Law Offices of Scott W. Wynn
254 Main Street
Charlestown, MA 02129
(617) 241-5544

David M. Campbell, Esq
Counsel for the Defendant
Visconti and Boren Ltd.
55 Dorrence Street
Providence, R.I. 02903-2219
(401) 331-3800

/s/ Bruce E. Falby

Bruce E. Falby, Esq.
DLA Piper Rudnick Gray Cary US LLP
33 Arch Street, 26th. Floor
Boston, MA 02110-1447
(617) 406-6000